

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>V.</b>	)	<b>CIVIL NO. DR-20-CV-36-</b>
	)	
<b>\$1,531,924.54 IN UNITED STATES</b>	)	
<b>CURRENCY SEIZED FROM</b>	)	
<b>JPMORGAN CHASE BANK ACCOUNT</b>	)	
<b>405685541 IN THE NAME OF</b>	)	
<b>D L INVESTMENTS,</b>	)	
	)	
<b>Respondent.</b>	)	

**VERIFIED COMPLAINT FOR FORFEITURE**

Comes now Petitioner United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, pursuant to Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., and respectfully states as follows:

**I.  
NATURE OF THIS ACTION**

This action is brought by the United States of America seeking forfeiture to the United States of the following property:

**\$1,531,924.54 in United States Currency Seized from JPMorgan Chase Bank Account  
405685541 in the Name of D L Investments,**

hereinafter the "Respondent Property."

**II.  
JURISDICTION AND VENUE**

Under Title 28 U.S.C. § 1345, this Court has jurisdiction over an action commenced by the United States, and under Title 28 U.S.C. § 1355(a), jurisdiction over an action for forfeiture. This

Court has *in rem* jurisdiction over the Respondent Property under Title 28 U.S.C. §§1355(b) and 1395. Venue is proper in this district pursuant to Title 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this district, and pursuant to Title 28 U.S.C. §§ 1355(b)(1)(B) and 1395(b) because the Respondent Property is found in this district.

### **III.** **STATUTORY BASIS FOR FORFEITURE**

This is a civil forfeiture action *in rem* brought against the Respondent Property for violation of Title 18 U.S.C. § 1343 and subject to forfeiture to the United States of America pursuant to Title 18 U.S.C. § 981(a)(1)(C), which states (with emphasis added):

**§ 981. Civil forfeiture**

(a)(1) The following property is subject to forfeiture to the United States:

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(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting “*specified unlawful activity*” (as defined in section 1956(c)(7) of this title . . . .

↓

**§ 1956. Laundering of monetary instruments**

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(c) As used in this section—

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(7) the term “*specified unlawful activity*” means—

(A) any act or activity constituting an offense listed in section 1961(1) of this title . . . .

↓

**§ 1961. Definitions**

As used in this chapter—

(1) “*racketeering activity*” means . . . (B) any act which is indictable under any of the following provisions of *title 18, United States Code*: . . . section 1343 (*relating to wire fraud*) . . . .

**IV.**  
**FACTS IN SUPPORT OF VIOLATIONS**

See Appendix A for facts under seal.

**V.**  
**PRAYER**

WHEREFORE, Petitioner, United States of America, prays that due process issue to enforce the forfeiture of the Respondent Property, that due notice pursuant to Rule G(4) be given to all interested parties to appear and show cause why forfeiture should not be decreed,<sup>1</sup> and in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., that the Respondent Property be forfeited to the United States of America, that the Property be disposed of in accordance with the law and for any such further relief as this Honorable Court deems just and proper.

Respectfully submitted,

JOHN F. BASH  
United States Attorney

By: 

Antonio Franco, Jr.  
Assistant United States Attorney  
Asset Forfeiture Section  
601 NW Loop 410, suite 600  
San Antonio, TX 78216  
Tel: 210-384-7040  
Fax: 210-384-7045  
Email: antonio.franco@usdoj.gov  
Texas Bar No. 00784077

Attorneys for the United States of America

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<sup>1</sup> Appendix B, which is being filed along with this complaint, will be sent to those known to the United States to have an interest in the Respondent Property.

**VERIFICATION**

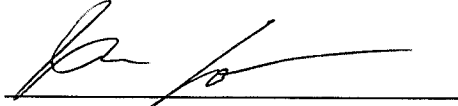
Special Agent Marc Epstein, declares and says that:

1. I am a Special Agent with the Federal Bureau of Investigation, assigned to the San Antonio Division, Del Rio Resident Agency, and I am the investigator responsible for the accuracy of the information provided in this litigation.

2. I have read the above Verified Complaint for Forfeiture and know: the contents thereof; the information contained in the Verified Complaint for Forfeiture has been furnished by official government sources; and the allegations contained in the Verified Complaint for Forfeiture are true based on information and belief.

Pursuant to Title 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 12<sup>th</sup> day of May, 2020.

  
\_\_\_\_\_  
Marc Epstein, Special Agent  
Federal Bureau of Investigation  
San Antonio Division  
Del Rio Resident Agency